



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**MAY 09 2011**

Joyce M. Stille  
Administrative Officer  
Town of Bolton  
222 Bolton Center Road  
Bolton, Connecticut 06043

Re: PCB Cleanup and Disposal Approval under 40 CFR § 761.61(a)  
and § 761.79(h)  
Bolton High School (Phase 2)

Dear Ms. Stille:

This is in response to the Town of Bolton Notification<sup>1</sup> for approval of a proposed PCB cleanup for the Bolton High School located at 72 Brandy Street, Bolton, Connecticut (the Site). The Site contains PCB-contaminated materials that exceed the allowable PCB levels under the federal PCB regulations at 40 CFR §§ 761.20, 761.61(a), and 761.62. Specifically, PCBs have been identified in interior and exterior caulk; in the building substrates; and in soils.

In the Notification, the Town of Bolton indicates that the abatement of the PCB contamination at the Site will be conducted in a phased approach due to the critical time schedule for the overall abatement work. The second phase of the project will address the PCB caulk located around windows W16 through W39. The Town of Bolton has requested cleanup of the PCB contamination under the self implementing cleanup and disposal option (SIP) at § 761.61(a) and the alternative decontamination option at § 761.79(h). The following PCB cleanup standards and activities are proposed for this project:

- Remove and dispose of PCB caulk with greater than or equal to ( $\geq$ ) 1 part per million (ppm);
- Remove metal window frames in contact with PCB caulk and dispose of as *PCB bulk product waste*;

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<sup>1</sup> Information was submitted on behalf of Town of Bolton by Eagle Environmental to satisfy the notification requirements under 40 CFR §§ 761.61(a)(3) and 761.79(h). Information was provided dated March 8, 2011 (SIP), March 25, 2011 (Email work hours), April 13, 2011 (Response to EPA Comments), and April 22, 2011 (Email Contractor Work Plan). These submittals shall be referred to as the "Notification."

- Remove and dispose of PCB-contaminated *porous surfaces* (i.e. concrete block and brick) with  $\geq 1$  ppm; and,
- Dispose of PCB wastes in a TSCA-approved disposal facility or RCRA hazardous waste landfill, with the exception of soffit caulk, concrete block and brick with less than ( $<$ ) 50 ppm. These  $< 50$  ppm PCB materials will be disposed of in accordance with §761.61(a)(5)(i)(B)(2)(ii).

Based on the EPA's review, the information provided meets the notification requirements under 40 CFR §§ 761.61(a)(3) and 761.79(h). The Town of Bolton may proceed with its cleanup in accordance with 40 CFR §§ 761.61(a); 761.62; 761.79(h); its Notification; and this Approval, subject to the conditions of Attachment 1.

Please be aware that this Approval requires the Town of Bolton to continue to conduct outreach activities for the school community on the PCB remediation work. This outreach effort shall be coordinated with EPA and the Connecticut Department of Environmental Protection (CTDEP) (see Attachment 1, Condition 12).

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100 (OSRR07-2)  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527

Following completion of the PCB work authorized under this Approval and detailed in its Notification, the Town of Bolton will be collecting indoor air and surface wipe samples to document that the PCB abatement activities did not impact indoor conditions. EPA will require that the Town of Bolton provide the results of this sampling prior to the new school year (see Attachment 1, Condition 13.b).

As indicated in the Notification, PCB caulk with  $\geq 50$  ppm is present at the Site around the W1 through W39 interior and exterior window frames, door frames, and in soils. Be aware that this Approval is only for the remediation of PCB building materials found in windows W16 through W39 and door frames. The Town of Bolton may submit a modification to the plan to address the remaining windows (W1-W15) and soils in accordance with Attachment 1, Condition 17. A copy of this plan also should be provided to CTDEP.

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in blue ink, appearing to read "James T. Owens III", with a stylized flourish at the end.

James T. Owens III, Director  
Office of Site Remediation and Restoration

Attachment 1

cc: A. Roychowdhury, Eagle Environmental  
G. Trombly, CTDEP  
File



## ATTACHMENT 1

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS  
TOWN OF BOLTON HIGH SCHOOL (PHASE 2)  
72 BRANDY STREET  
BOLTON, CONNECTICUT**

### GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Bolton High School and identified in the Notification.
2. The Town of Bolton shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. The Town of Bolton must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during PCB cleanup and disposal activities authorized under this Approval, the Town of Bolton shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. The Town of Bolton is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town of Bolton has or receives information indicating that it or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town of Bolton are authorized to conduct the activities set forth in the Notification. The Town of Bolton is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the Town of Bolton from compliance with any applicable requirements of federal, state or local law; or 3) release the Town of Bolton from liability for, or otherwise resolve any violations of federal, state or local law.

#### **CERTIFICATION AND NOTIFICATION CONDITIONS**

9. This Approval may be revoked if the EPA does not receive written notification from the Town of Bolton of its acceptance of the conditions of this Approval within 10 business days of receipt.
10. The Town of Bolton shall notify EPA in writing of the scheduled date of commencement of on-site activities at least 1 business day prior to conducting any work under this Approval.
11. Prior to initiating onsite work under this Approval, the Town of Bolton shall submit the following information for EPA review and/or approval:
  - a. a certification signed by its selected abatement/remediation contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
  - b. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the analytical and quality assurance requirements specified in the Notification and in this Approval; and,
  - c. an air sampling plan for monitoring the effectiveness of the containment. The sampling plan shall specify the air action levels that will be used for the project and how exceedances will be addressed.

#### **CLEANUP AND DISPOSAL CONDITIONS**

12. The Town of Bolton shall conduct outreach activities for the school community on the PCB remediation work. This outreach effort shall be coordinated with EPA and the Connecticut Department of Environmental Protection (CTDEP). The Town of Bolton shall submit information on its outreach activities for this phase of work within 10 days of receipt of this Approval.
13. PCB-contaminated materials shall be decontaminated as described below:
  - a. The PCB cleanup standard for building *porous surfaces* (i.e. concrete block and brick) shall be less than or equal to ( $\leq$ ) 1 part per million (ppm).
    - i) All visible residues of PCB caulk shall be removed to the extent practical from the PCB-contaminated *porous surfaces*.



- ii) PCB-contaminated *porous surfaces* shall be removed and disposed of as described in the Notification.
  - b. Post-abatement indoor air sampling and indoor surface sampling for PCBs shall be conducted to verify the effectiveness of the containment methods that were used during the abatement/remedial activities.
    - i) Indoor air sampling shall be conducted in accordance with EPA Method TO-4A or TO-10A. Sufficient sample volumes shall be collected to provide a minimum laboratory reporting limit of  $< 0.05 \mu\text{g}/\text{m}^3$ . At a minimum, PCB analysis shall include PCB homologues and/or PCB congeners.
    - ii) Wipe sampling of indoor horizontal surfaces (e.g. floors, desk tops (as applicable)) shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR §761.123 (i.e.  $\mu\text{g}/100 \text{ cm}^2$ ). Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to 40 CFR Part 761, Subpart Q. The minimum laboratory reporting limit shall be  $1 \mu\text{g}/100 \text{ cm}^2$ .
    - iii) Analytical results of the post-abatement air and surface sampling shall be submitted to EPA within 5 business days of Town of Bolton's receipt of the results and prior to the start of the new school year.
14. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
15. All PCB waste (regardless of concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with § 761.40; stored in a manner prescribed in § 761.65; and, disposed of in accordance with 40 CFR § 761.61(a)(5) and § 761.62, unless otherwise specified below:
- a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g).
  - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).

- c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR §761.79(b)(1) or disposed of under § 761.60

### **INSPECTION, MODIFICATION AND REVOCATION CONDITIONS**

- 16. The Town of Bolton shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the Town of Bolton to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
- 17. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
- 18. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
- 19. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

### **RECORDKEEPING AND REPORTING CONDITIONS**

- 20. The Town of Bolton shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the decontamination and the analytical sampling shall be established and maintained by the Town of Bolton in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
- 21. The Town of Bolton shall submit a final report to the EPA within 60 days of completion of the entire project. At a minimum, this final report shall include: a short narrative of the entire project activities, which also includes the previous approved PCB abatement activities associated with Phase 1; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of and the size of the decontaminated area(s); copies of manifests and/or bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer.



22. As required under Condition 13.b. the analytical results of the post-abatement air and surface sampling shall be submitted to EPA within 5 business days of the Town of Bolton's receipt of the results and prior to the start of the new school year.
23. Required submittals shall be mailed to:  
  
Kimberly N. Tisa, PCB Coordinator  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100 (OSRR07-2)  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527
24. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

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**END OF ATTACHMENT 1**